

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** § **CASE NO. 17-36174**

**BILLY JOE CRAWFORD, JR. and**  
**JEAN LANNETT CRAWFORD,** §  
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**DEBTORS** §  
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**CHAPTER 13**  
**HEARING ON**  
**MOTION TO LIFT STAY:**  
**DECEMBER 11, 2018**  
**TIME: 9:00 A.M.**

**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY REGARDING POSSESSORY INTEREST  
IN 18203 MAPLE ARBOR COURT, CYPRESS, TEXAS**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Debtors, BILLY JOE CRAWFORD, JR., and JEAN LANNETT CRAWFORD, by and through the undersigned attorney, and file this Debtors' Response to Motion for Relief from Automatic Stay Regarding Possessory Interest in 18203 Maple Arbor Court, Cypress, Texas and would respectfully show the Court as follows:

1. Debtors ask the Court to deny Movant's Motion for Relief from Automatic Stay Regarding Possessory Interest in 18203 Maple Arbor Court, Cypress, Texas.
  2. It is anticipated that all requests made by the Movant will be resolved prior to or at the time of the hearing in this matter.

WHEREFORE, because the factual allegations support a claim upon which the Court may grant relief to the Debtors, the Court should deny Movant's Motion for Relief from Automatic Stay Regarding Possessory Interest in 18203 Maple Arbor Court, Cypress, Texas and grant Debtors all other relief as just.

Respectfully submitted,

WEBB & ASSOCIATES  
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BY: /s/ Timothy Webb  
**TIMOTHY WEBB**  
State Bar No. 00797639  
**Attorney for Debtors**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above was served on the below individuals via ECF, unless not available, otherwise by regular first-class mail in accordance with the Federal Rules of Civil Procedure on December 4, 2018.

/s/ Timothy Webb  
TIMOTHY WEBB